

## **The Honorable John C. Coughenour**

**UNITED STATES DISTRICT COURT**  
**FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

JAMES E. FRANCIS,  
Plaintiff,  
vs.  
MAERSK LINE, LIMITED, and  
UNITED STATES OF AMERICA,  
Defendants.

Case No. CV03-2898C

**STIPULATION AND ORDER RE  
EXPERT WITNESS DISCLOSURE  
DATES AND EXPERT WITNESS  
DISCOVERY DEPOSITION  
DEADLINE**

WHEREAS the plaintiff continues to receive treatment for several medical issues, the plaintiff's medical condition has changed in the last six months, and the efficient conduct of discovery and efficient trial preparation requires a limited continuation of the deadline for certain discovery items, the parties, through their undersigned counsel, hereby agree and respectfully request that the Court continue certain preliminary dates primarily relating to expert discovery, as follows:

## STIPULATION

1. The disclosure of preliminary expert witness reports shall be continued to August 1, 2005;

2. The disclosure of preliminary rebuttal expert witness reports shall be continued until August 22, 2005;

3. Expert witness and treating medical provider discovery depositions shall be completed no later than September 19, 2005.

The parties believe that the requested continuations will not affect the trial date or the pretrial schedule, and should enable the parties to more narrowly

tailor the issues for presentation at trial. If the requested continuations would cause the Court to continue the trial date, however, plaintiff will withdraw from the foregoing stipulation.

4 5 6 7 8 9 10 11 12 13 14 15 16 17	<p><b>GASPICH &amp; WILLIAMS</b></p> <p>/s/ Russell R. Williams, WSBA No. 21303 Anthony G. Gaspich, WSBA No. 19300 1809 Seventh Avenue, Suite 609 Seattle, WA 98101 Telephone: (206) 956-4204 Fax: (206) 956-4214 Email: russ@gaspichwilliams.com tony@gaspichwilliams.com Counsel for Plaintiff James Francis</p>	<p><b>U. S. DEPARTMENT OF JUSTICE</b></p> <p>/s/ Jeanne M. Franken R. Scott Blaze West Coast Office, 7-5395 Federal Bldg. P. O. Box 36028 450 Golden Gate Avenue San Francisco, CA 94102-3463 Telephone: (415) 436-6630 Fax: (415) 436-6632 Email: jeanne.franken@usdoj.gov scott.blaze@usdoj.gov Counsel for Defendant United States Of America</p>

## ORDER

The parties, having so stipulated, it is SO ORDERED.

DATED this 20<sup>th</sup> day of May, 2005.

John C. Coyne, Jr.

UNITED STATES DISTRICT JUDGE

Case No.: CV03-2898C

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DEADLINE - 2 SE4050

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